

## PART 2 INDEPENDENT GROUPS

### Chapter 17: R. Warren Meddoff

Shortly before the 1996 election, Florida businessman Warren Meddoff approached President Clinton at a Florida fundraiser concerning a possible \$5 million donation to the President's campaign from Meddoff's associate, William Morgan. Meddoff told Ickes that Morgan wanted to make at least some of his contributions tax deductible, and Ickes prepared a memo suggesting some possible tax-exempt and tax deductible recipients. After sending the memo to Meddoff, Ickes received word that a DNC background check of Meddoff and his associate raised serious questions and that it would be better for the DNC to decline Meddoff's offer of contributions. Ickes and Meddoff dispute what happened next. Meddoff testified that Ickes told him to "shred" the memo; Ickes testified that he merely told Meddoff that the memo "was inoperative."

Based on the evidence before the Committee, we make the following findings regarding these events:

### FINDINGS

- (1) **There is no evidence before the Committee suggesting that Harold Ickes or any DNC official acted illegally in their dealings with Warren Meddoff.** Current law does not prohibit a federal government employee or party official from directing contributions to tax-exempt organizations.
- (2) **It would have been more prudent, as Ickes himself testified, for Ickes to have immediately referred Meddoff to the DNC.** Meddoff sought suggestions on how to make a tax-deductible contribution that would help President Clinton's campaign. The Committee does not have sufficient evidence to determine whether the organizations recommended by Ickes were actually engaged in any partisan political activities. Ickes's opinion that a contribution to such groups would benefit the President's campaign does not establish that these organizations were engaged in any activities that would have been inconsistent with their tax-exempt status.
- (3) **The DNC acted appropriately by checking the backgrounds of Meddoff and his associate and ultimately refusing their proposed contribution.**
- (4) **Meddoff is not a credible witness.** His explanation to the Committee of two past proposals on behalf of two different persons to contribute \$5 million to the Republican Party in one case and the Democratic Party in the other case; his admission of involvement in conduct that appears to be an attempt to bribe a

federal official; his apparent threats to his former employer and a DNC fundraiser; and the fact that he never met the person on whose behalf he was allegedly making a \$5 million contribution to help President Clinton, cast significant doubt on his credibility.

### **WARREN MEDDOFF**

Warren Meddoff, described as a “businessman” in published news reports, has worked at a commodities trading firm, at a car dealership as a business manager, and as a real estate broker at three different companies.<sup>1</sup> From 1983 to 1988, Meddoff also served as a member of the executive committee for the Republican Party in Broward County, Florida.<sup>2</sup> During that same time period, Meddoff registered to run for the Florida State House as a Republican, but later withdrew his candidacy.<sup>3</sup> Meddoff testified that he started his own company in 1989, called R. Warren Meddoff, P.A., located in Fort Lauderdale, Florida.<sup>4</sup> Meddoff described his work as a consultant with “areas of involvement in real estate, investment development and brokerage, and in consulting on financial matters under contract with several foreign governments, those governments having been Bulgaria, Romania, the Ukraine, Tajikistan, and Moldova.”<sup>5</sup> In October 1996, Meddoff was hired as an export manager by Bukkehave, Inc., a wholly owned subsidiary of a Danish corporation.<sup>6</sup>

Since 1989, Meddoff has also had business dealings with an individual named William Morgan.<sup>7</sup> These business dealings involve gold-backed bearer bonds issued by Germany’s Weimar Republic before World War II.<sup>8</sup> Meddoff has sought, so far unsuccessfully, to “utilize and develop” these bonds as a source of income.<sup>9</sup> Meddoff claims that Morgan, unlike himself, has been able to “close transactions” involving these bonds,<sup>10</sup> but Morgan is a “mysterious character whose stories don’t always quite add up,” according to Vanity Fair.<sup>11</sup> Despite dealing with him for more than five years, speaking with him up to five to ten times a day and entering into contracts with him, Meddoff testified that he has never met Morgan.<sup>12</sup> Morgan did not pay Meddoff for his representation, and Meddoff said he has never made any money from his association with Morgan. Meddoff claims that he has never checked into Morgan’s background or net worth.<sup>13</sup> The little information the Committee could garner about Morgan invited considerable skepticism about Meddoff’s claims that Morgan is frequently at the center of multi-million dollar business deals. The Committee learned that Morgan operates a business out of a house which he does not own, that properties he does own have had two IRS liens against them, and that he defaulted on a personal note in 1988 and was unable to even afford an attorney at that time.<sup>14</sup>

### **MEDOFF AND THE OCTOBER 1996 FUNDRAISER**

On October 22, 1996, according to Meddoff’s testimony, Meddoff was sent by his employer, Bukkehave, to a Democratic fundraiser held at the Biltmore Hotel in Coral Gables, Florida. His primary purpose in attending was to assist a client of Bukkehave, Catholic Relief Services, in making humanitarian flights to Cuba to assist victims of a recent hurricane there.<sup>15</sup>

Administration policy at that time did not permit direct flights to Cuba and Meddoff was tasked to seek administration support for the charity's proposed relief flights.<sup>16</sup> Meddoff said he spoke with Morgan earlier that day about his forthcoming attendance at the fundraiser that night.<sup>17</sup> According to news reports, however, Morgan has said that Meddoff was the one who originally proposed that Morgan propose a contribution.<sup>18</sup> During that conversation, Morgan asked Meddoff to inform the President that he wished to make a contribution of \$5 million to President Clinton.<sup>19</sup> At the fundraiser, Meddoff handed President Clinton a business card on which he had written, "I have an associate that is interested in donating \$5 million to your campaign."<sup>20</sup> The President took the card, asked for another one for his staff, and indicated that someone would get back to him.<sup>21</sup> According to Meddoff, at "no time did the President discuss contributions or funds" during this conversation.<sup>22</sup>

Instead, during their conversation, which Meddoff said lasted between two to five minutes, the President and Meddoff discussed the aid flights to Cuba that his employer's client wished to undertake. When Meddoff told the President that Catholic Relief Services and the Catholic diocese wanted his support for those flights, the President, according to Meddoff, responded, "I've made the decision . . . Tell the people they'll be able to fly."<sup>23</sup> The White House had formally announced that morning, before the President had left Washington for Florida, that Catholic Charities would be permitted to fly relief supplies to Cuba.<sup>24</sup> Meddoff testified that he did not believe that the President's decision had "anything to do with me."<sup>25</sup> In addition, Meddoff testified in his deposition that Bukkehave's interest in the aid flights was "a humanitarian issue, not one of going out for remuneration or trying to get some sort of financial benefit from it."<sup>26</sup>

### **ICKES'S CONVERSATIONS WITH MEDDOFF**

After the Florida fundraiser, the President asked Harold Ickes, White House deputy chief of staff, to contact Meddoff concerning the proposed contribution. Pursuant to this direction from the President, Ickes had a telephone conversation with Meddoff on October 26 in which they discussed the possible \$5 million contribution.<sup>27</sup> These contributions were to come from the proceeds of a business deal to be completed by November 1 from which Morgan expected to realize over \$300 million.<sup>28</sup> Meddoff explained that Morgan, in addition to the proposed \$5 million donation, was contemplating additional donations over a period of time that would total over \$50 million.<sup>29</sup> Meddoff said he told Ickes that the funds were not the product of any criminal activity and originated from within the United States, but that he did not describe the specific nature of Morgan's pending transaction. Meddoff said he did convey to Ickes, however, that Morgan wished to get a tax benefit out of the contribution in order to reduce his anticipated tax liability on the pending deal.<sup>30</sup> When asked during his deposition how Morgan anticipated making a tax-deductible donation to a political campaign, Meddoff testified "he [Morgan] sometimes has a misconception of the reality of our legal system and what works and what doesn't work."<sup>31</sup> During this and subsequent conversations with Ickes, Meddoff said that he "never relayed on a request" for anything in connection with the proposed contributions.<sup>32</sup>

During one of these conversations, according to Meddoff, Ickes asked whether Morgan would also be willing to make a non-tax-deductible donation to the DNC.<sup>33</sup> Meddoff says that, after consulting with Morgan, he informed Ickes that Morgan was willing to make such a contribution once the funds became available to him.<sup>34</sup>

On October 29, according to Meddoff, Ickes telephoned Meddoff from Air Force One and said, “We have an immediate need for \$1.5 million within the next 24 hours. Do you think you could get it to us?”<sup>35</sup> After consulting with Morgan, Meddoff said he told Ickes that a contribution within 24 hours would not be possible, but that Morgan was expecting to receive some of his money within 48 hours and a contribution could be effected within that time frame.<sup>36</sup> Meddoff says he requested information on where to send the funds and how to do so.<sup>37</sup> Medoff says that Ickes told him that he would be sending information on “501(c)(3)’s (charitable, tax-exempt organizations) that were friendly to the President’s campaign and supported the same areas, and . . . also what would be a non-tax-favorable contribution to the Democratic National Committee.”<sup>38</sup> Ickes, for his part, does not remember this conversation with the same level of detail, but confirmed in his deposition that he called Meddoff from Air Force One, discussed Morgan’s desire to make a tax-deductible contribution to assist President Clinton, and promised to provide him with information about entities to which such contributions could be made.<sup>39</sup> Ickes also testified that, immediately after speaking with Meddoff, he called Eric Berman, head of research at the DNC, and asked him to check the background of both Meddoff and Morgan.<sup>40</sup>

On October 31, according to the testimony of both Ickes and Meddoff, Meddoff received a fax from Ickes providing information concerning the following four groups, along with proposed contribution amounts: (i) National Coalition of Black Voter Participation (\$40,000); (ii) Defeat 209 (\$250,000); (iii) Vote Now ‘96 (\$250,000); and (iv) Democratic National Committee (\$500,000).<sup>41</sup> Meddoff testified that he forwarded this fax to Morgan on the assumption that Morgan would share the information with his attorneys and accountants in order to make the ultimate decisions about which organizations would receive the contributions.<sup>42</sup> Ultimately, as explained in more detail below, Morgan made none of the suggested contributions.

### **NO EVIDENCE OF ILLEGAL COORDINATION**

Ickes has testified that with hindsight, it would have been better if he had not sent the fax, but that he did not believe that he did anything improper. In his deposition he stated:

I’m confident I did nothing illegal . . . it would have been the better part of discretion for me to have handed this whole thing off to the professional fundraisers [at] the DNC to handle, but given the press of time, given the fact that the President asked me to take care of this and he didn’t say that I had to make the call, but given the press of time and given the fact that if this money was going to be forthcoming and if it was going to be used for the election, it had to get done quickly, and I knew that I could get it done quickly or that I would get it done quickly. [With] 20/20 hindsight, I

should have handed it off to the DNC.<sup>43</sup>

The Committee agrees that Ickes would have been well-advised to refrain from providing such information to a potential contributor in order to avoid any appearance of improper coordination. Nevertheless, the simple fact that Ickes identified non-profit groups in response to a desire from a potential contributor to make a tax-deductible contribution does not establish that improper coordination has occurred. There is no evidence, for example, that Ickes or the groups proposed that the contributions be spent in coordination with the White House or DNC officials.

### **ICKES'S ALLEGED DIRECTION TO MEDDOFF TO SHRED THE FAX**

Meddoff has testified that on the afternoon of October 31, the same day that Meddoff received the fax from Ickes identifying the tax-exempt groups to whom contributions could be made, Ickes called Meddoff concerning the fax.<sup>44</sup> During this conversation, according to Meddoff, Ickes explained the fax he had sent that morning had been sent "in error" and asked him to shred it.<sup>45</sup> Ickes, for his part, has denied that he told Meddoff to shred the fax. Ickes testified in his deposition, "My recollection is that I called Meddoff and told him . . . that the memo was inoperative . . . I have no recollection of saying that I would shred a memo. I find it inconceivable that I would use that kind of language to somebody -- with somebody that I knew, much less that I had no idea who I was talking about."<sup>46</sup>

At the hearing, Senator Nickles indicated that Ickes had covered up his actions in light of the fact that the White House had been unable to locate an original copy of the memorandum faxed the Meddoff. In response, Ickes pointed out that he had voluntarily produced to the Committee the identical information:

I have never seen the original of the document, Senator, of the memo. Newsweek did fax that memo or I received a copy of the memo from Newsweek. That was in my files. That was turned over. That is the document that you are referring to here, number one.

Number two is, every--virtually every pertinent aspect and piece of information that is in the typed memo is also contained in my handwritten notes, which were turned over to the Committee.<sup>47</sup>

Ickes did not have a copy of the original because he had dictated it from Air Force One to the White House, which then faxed it to Meddoff. Ickes had only his handwritten notes which he kept and produced to the Committee. The fact that Ickes kept these handwritten notes in his files belies the contention that he either sought to hide the contents of the memo from the Committee or even that he asked Meddoff to shred the memo in the first place.<sup>48</sup>

### **MEDDOFF'S CREDIBILITY**

Meddoff's dramatic account of having been instructed by Ickes to shred a document made an issue of his credibility. The evidence before the Committee raises serious doubts about Meddoff's credibility. Moreover, the evidence strongly suggests that Meddoff had a personal interest in appearing before the Committee -- his desire to damage his former employer, Bukkehave, Inc.

Meddoff was fired from his job at Bukkehave in July 1997.<sup>49</sup> Meddoff was terminated for numerous violations of company policy for which he had been warned, including misuse of company credit cards, mis-allocation of resources, habitual tardiness, failing in his duties, and making negative comments about the company and its officers.<sup>50</sup> On September 10, 1997, (the day before Meddoff was originally scheduled to testify before the Committee), he sent an e-mail to Christian Haar, the CEO at Bukkehave, stating:

The problem with betraying someone's trust and friendship is that the individual that you betrayed will never forgive the betrayal. Tomorrow you and your company will come under international scrutiny and scorn. Prepare to face the [w]rath of an entire country[,] foreigner. I am sure that the President and Vice President, let alone Chrysler, will thank you for the trouble that you have caused and will be caused due to your personal actions.<sup>51</sup>

This e-mail presented a disturbing picture of a hidden agenda behind Meddoff's testimony. In light of these facts, the Committee has serious questions about the extent to which Meddoff's animosity toward his former employer may have colored his hearing testimony.

Meddoff's character was further tarnished in light of information concerning a previous episode wherein Meddoff spun a fanciful scenario proposing a huge political contribution on behalf of a client to be funded by a not-yet-complete transaction. In February 1995 -- a year and a half before Meddoff gave President Clinton his business card at the Biltmore Hotel fundraiser -- he sent a letter to Senator Dole offering to donate \$5 million to help the Republican Party win the 1996 presidential election.<sup>52</sup>

In the letter, Meddoff explained that he was representing an entity called Jelico Investments, Inc. in connection with a project on behalf of the government of Bulgaria that involved the exchange of pre-1940 gold-backed German bonds. According to Meddoff, his client told him to make the offer of a \$5 million contribution to the RNC to Senate Majority Leader Dole and House Speaker Newt Gingrich in order to influence the U.S. Government to "take a hands-off position" on the transaction so that the deal could go through.<sup>53</sup> Meddoff's client "felt that if both parties were cognizant of the fact that there was a possibility of such large term donations made to them, that the U.S. Government would take a hands-off position and not involve itself one way or the other."<sup>54</sup> By Meddoff's own account, his actions on behalf of his client in this matter sought to influence public policy in exchange for a promised contribution. During the hearing, Senator Levin made the following observation about the potential seriousness of Meddoff's overture to Dole:

So you now write the White House and Senator Dole saying you have been notified that U.S. Government employees are interfering with the transaction. You believe that if that interference is removed, it would facilitate that transaction, and you are offering both of them \$5 million from the proceeds of that transaction. That comes very, very close, Mr. Meddoff, to being the offer of a bribe.<sup>55</sup>

The contribution was never made, Meddoff claims, because the German bond deal fell through.<sup>56</sup>

In February of 1996, Meddoff wrote a letter on his own behalf to President Clinton with an exceedingly familiar ring.<sup>57</sup> Meddoff's letter related that he was prepared to make a substantial contribution to President Clinton and asked for a meeting with the president during his upcoming visit to Washington with his family in April.<sup>58</sup> In his deposition, Meddoff testified that he was involved at that time in a transaction to sell 493,000 "historical documents," i.e. the gold-backed bonds.<sup>59</sup> Meddoff anticipated closing on the contract in mid-March, at which time he would realize over \$350 million in profit.<sup>60</sup> Unsurprisingly, Meddoff testified that this deal fell through and the proposed contribution, like the other proposed contributions from his clients that were supposed to be funded from such deals, was never made.<sup>61</sup> President Clinton never responded to the February letter.<sup>62</sup>

Meddoff's claims to have represented two different clients who each independently sought to use him to advance identical promises of a \$5 million political contribution from the proceeds of a pending transaction involving gold-backed bonds strains any reasonable notion of credibility.<sup>63</sup> The fact that Meddoff himself proposed a similar contribution, contingent on the outcome of a wildly lucrative business deal, raises additional doubts about the true purpose of these proposed contributions and Meddoff's actual motives. The proposed transactions based on the value of "historical documents" also raise suspicion given that many experts consider such "deals" to constitute nothing more than "securities, mail and wire fraud."<sup>64</sup>

Evidence also indicates that, according to Morgan, Meddoff sent him a falsified memo in the summer of 1996 which was designed to look as if it came from then-White House Chief of Staff Leon Panetta.<sup>65</sup> Reportedly written on what looks like official White House stationery, the memo, dated February 8, 1996, purports to advise Meddoff about how one of his Weimar bond deals should be handled.<sup>66</sup>

These doubts are underscored by Meddoff's threats to a Democratic fundraiser concerning his allegations about Ickes. In November, about a week after Ickes allegedly asked him to shred the memo, Meddoff related his story about the alleged direction by Ickes to shred the faxed memorandum to a cousin who worked for Newsweek. At the time, Meddoff claims he told Newsweek that his information could be used for background purposes, but he withheld permission to use his name.<sup>67</sup> In January 1997, Mitchell Berger, a Florida Democratic fundraiser with ties to Vice President Gore, solicited a \$25,000 contribution related to the presidential inauguration from Meddoff's employer, the Bukkehave company. When Meddoff, accompanied by the Danish CEO of Bukkehave's parent company, traveled to Washington to present the check, Meddoff claims that Berger told him that, due to a policy change in the administration, the

contribution could not be accepted since Bukkehave was a U.S. subsidiary of a foreign corporation and Bukkehave's CEO was a foreign national.<sup>68</sup> According to Meddoff, Berger's rebuff made him "contemptuous of the disdain that individuals would have for corporations or individuals that are prepared to make donations of that type."<sup>69</sup> In response, Meddoff threatened to go public with his allegations concerning Ickes. "I had informed him that, as he well knew, since he had seen the documents from Mr. Ickes, he was aware that I had provided it to certain people within the media for research purposes; that they had from other sources confirmed it and that they were prepared to print it. I said to Mitchell, 'You know this is all going to come out,' and he says, 'We don't care. Take your best shot.'"<sup>70</sup> Meddoff subsequently authorized Newsweek to use his name and the story was published in February.<sup>71</sup> Meddoff's attempt to pressure Berger into accepting a political contribution from his employer by threatening to "go public" with his claims about Icke's alleged direction to shred the memorandum reveal another potential motivation for Meddoff to embellish the circumstances of his conversations with Ickes and cast further doubt on his credibility.

### **THE DNC'S REFUSAL OF THE CONTRIBUTION OFFER**

The same day that he sent the memorandum identifying tax-exempt organizations to Meddoff, Ickes referred Meddoff's possible contribution to the DNC. A DNC official then contacted Meddoff. Meddoff informed the DNC that "what Mr. Morgan was looking for at that time was a letter designating the fact that he was supporting the President and the President was thanking him."<sup>72</sup> Meddoff did receive a letter from DNC Chairman Donald Fowler, stating:

Please accept my deep appreciation for the substantial financial support you have offered the Democratic Party. Your support will help advance President Clinton's agenda for the American people in the 21st Century. We look forward to working with you in the future. Best regards. Don Fowler<sup>73</sup>

This letter was not what Morgan wanted, however, because "the letter did not specify that Mr. Morgan was making contributions or the fact that it was done in support of the President." Morgan also "wanted language to the effect that if there was anything that could be done in the future, to please notify them."<sup>74</sup> Since the letter did not contain what Morgan was looking for, Meddoff edited the letter to include the changes that Morgan was looking for and faxed it back to Fowler.<sup>75</sup> Meddoff called DNC Finance Director Richard Sullivan three times on October 31 alone, to get the letter he was seeking for Morgan.<sup>76</sup> Sullivan never returned Meddoff's phone calls.<sup>77</sup>

The DNC looked into Meddoff and Morgan and found, among other things, that Meddoff had sued the government of Romania and various Romanian government officials for fraud.<sup>78</sup> Meddoff later told Newsweek that the "DNC was being so careful and that they weren't circumventing anywhere to get large donations. . . . They weren't circumventing laws. They weren't cutting any corners. They were being very careful in my case, the DNC, to do everything



properly and to make sure it was done properly.”<sup>79</sup>

Meddoff spoke to Fowler three to five times.<sup>80</sup> In his deposition, Fowler testified that he told Meddoff that unless they could find someone to validate the appropriateness of the contribution, it would not be accepted, and he asked for references. Meddoff replied, “[Y]es, here are a few numbers that you can call, but if they answer something about the CIA, don’t be surprised.”<sup>81</sup> Fowler did not follow up with Meddoff any further, and he told Sandler to tell Ickes that the DNC was not going to take the money.<sup>82</sup> When Sandler told Ickes that the contribution was not going to be pursued by the DNC, Ickes concurred with the decision.<sup>83</sup> Fowler and Sullivan cut off communications with Meddoff on October 31.<sup>84</sup> In May of 1997, despite stories that had appeared in the press concerning Meddoff’s proposed campaign contributions, Republican Majority Leader Trent Lott sent a letter to Meddoff thanking him for his contribution of \$2,500 to the Republican Presidential Roundtable and soliciting additional contributions.<sup>85</sup>

### **FUNDRAISING ON FEDERAL PROPERTY**

The discussions between Ickes and Meddoff also raised the issue of whether Ickes’s phone calls to Meddoff from Air Force One and the White House were illegal or improper instances of fundraising on government property. While Ickes’s brief involvement with a potential contributor before passing responsibility to DNC officials raised concerns, the Committee’s investigation showed that Ickes did not initially solicit Meddoff for funds. When Meddoff spoke to Ickes for the first time, he made it clear that there was “absolutely no doubt whatsoever” that Morgan wanted to make a contribution.<sup>86</sup> Ickes’s conversations with Meddoff at this point merely concerned the timing and form of the proposed contribution that Meddoff’s associate was already willing to make. Given these circumstances, it is difficult to characterize Ickes’s initial discussions with Meddoff as a solicitation.

According to Meddoff, however, during one of their subsequent discussions, Ickes asked Meddoff whether his associate would be willing to make a non-tax-deductible donation to the DNC. After Meddoff informed Ickes that this would be possible, Ickes sent information to Meddoff concerning the DNC’s bank account and suggested a contribution amount of \$500,000. While some allege that Ickes solicited a contribution to the DNC, as discussed in other sections of this report, there is considerable doubt as to whether a telephone call from federal property to someone not on federal property concerning soft money contributions constitutes an illegal solicitation within the meaning of the Pendleton Act.

An additional threshold issue is whether the phone line that was used by Ickes was a DNC line or a government line. The administration took great pains to provide separate lines of communication on Air Force One, paid for by the DNC, for communications related to the campaign. WHCA Commander Simmons testified in his deposition about a separate communication system, called INMARSAT, that was installed on Air Force One in the late summer or early fall of the 1996 campaign.<sup>87</sup> One of the advantages of the INMARSAT system was that it was capable of generating detailed billing records to separate political calls from

official calls.<sup>88</sup> Simmons testified that these efforts to separate political and officials costs were unprecedented. “[T]his administration has gone through more pain than anyone, and I give a historical reference because I have people who have been here through several administrations. It’s never been done, where they tried to break down and draw a demarcation line and say this is political and this is official.”<sup>89</sup> The Committee’s investigation was unable to conclusively establish which lines were utilized by Ickes in his communications with Meddoff.

## **CONCLUSION**

While the Minority agrees with Ickes’s statement that the “better part of discretion” would have been for him to have promptly passed the Meddoff matter to the DNC, the Committee found no evidence of illegal coordination between the DNC and the non-profit groups to which Ickes referred Meddoff. The only remaining issue of importance is the truth of Meddoff’s allegation that Ickes directed him to “shred” the memo listing the tax-exempt groups. Significantly, Ickes’s notes upon which the fax were based that Ickes had maintained in his files and a copy of the fax itself that was provided to Ickes by a news organization, were voluntarily produced to the Committee by Ickes without the necessity of a subpoena. It is difficult to reconcile Ickes’s cooperativeness with the Committee and his candid acknowledgement about drafting and sending the fax with Meddoff’s claim. Most importantly, the evidence before the Committee raises grave doubts about Meddoff’s credibility given the mysterious nature of his business dealings and associates, his apparent personal agenda in appearing before the Committee, and his apparent attempt at bribery in connection with a previous proposed contribution. Finally, the DNC, for its part, acted appropriately when it checked Meddoff’s and Morgan’s backgrounds and, rejected Meddoff’s offer.

1. R. Warren Meddoff deposition, 8/19/97, pp. 8-10.
2. R. Warren Meddoff deposition, 8/19/97, p. 15.
3. R. Warren Meddoff deposition, 8/19/97, pp. 15-16.
4. R. Warren Meddoff deposition, 8/19/97, p. 7.
5. R. Warren Meddoff deposition, 8/19/97, p. 7.
6. R. Warren Meddoff deposition, 8/19/97, p. 6.
7. R. Warren Meddoff deposition, 8/19/97, p. 11.
8. R. Warren Meddoff deposition, 8/19/97, p. 11.
9. R. Warren Meddoff deposition, 8/19/97, p. 11.
10. R. Warren Meddoff deposition, 8/19/97, p. 12.
11. Exhibit 2014M: Article regarding Harold Ickes which details Ickes's communications with Meddoff, Vanity Fair, 9/97; R. Warren Meddoff, 9/19/97 Hrg., p. 29.
12. R. Warren Meddoff, 9/19/97 Hrg., p. 27; R. Warren Meddoff deposition, 8/18/97, p. 13.
13. R. Warren Meddoff, 9/19/97 Hrg., pp. 117, 119, 126. Senator Glenn likened this to the movie, "The Sting" (a popular early 1970s film about an elaborate con game). Senator Glenn, 9/19/97 Hrg., pp. 119, 126.
14. R. Warren Meddoff, 9/19/97 Hrg., pp. 71-72, 118.
15. R. Warren Meddoff deposition, 8/19/97, p. 23.
16. R. Warren Meddoff deposition, 8/19/97, p. 23.
17. R. Warren Meddoff deposition, 8/19/97, p. 28.
18. Dallas Morning News, 2/4/97.
19. R. Warren Meddoff deposition, 8/19/97, p. 28.
20. R. Warren Meddoff deposition, 8/19/97, p. 9.
21. R. Warren Meddoff, 9/19/97 Hrg., pp. 7-8. There is a videotape of this fundraiser, but Meddoff does not appear on the tape, despite a few erroneous press accounts that state that the

tape shows President Clinton “being handed a business card by R. Warren Meddoff.” See, e.g., New York Times, 10/15/97.

22. R. Warren Meddoff, 9/19/97 Hrg., pp. 41-42; R. Warren Meddoff deposition, 8/18/97, pp. 30, 129.

23. R. Warren Meddoff deposition, 8/18/97, p. 129-30.

24. Exhibit 2016M: Newspaper article regarding U.S. aid flights to Cuba, Reuters North American Wire, 10/22/96; see also R. Warren Meddoff, 9/19/97 Hrg., p. 41.

25. R. Warren Meddoff, 9/19/97 Hrg., p. 41.

26. R. Warren Meddoff deposition, 8/19/97, p. 133.

27. R. Warren Meddoff, 9/19/97 Hrg., pp. 8-11.

28. R. Warren Meddoff, 9/19/97 Hrg., p. 38; R. Warren Meddoff deposition, 8/18/97, p. 53.

29. R. Warren Meddoff deposition, 8/19/97, pp. 44-45.

30. R. Warren Meddoff, 9/19/97 Hrg., pp. 9-11; R. Warren Meddoff deposition, 8/18/97, p. 53.

31. R. Warren Meddoff deposition, 8/19/97, pp. 127-128.

32. R. Warren Meddoff deposition, 8/19/97, p. 38.

33. R. Warren Meddoff deposition, 8/19/97, pp. 50, 161.

34. R. Warren Meddoff deposition, 8/19/97, pp. 50, 161.

35. R. Warren Meddoff deposition, 8/19/97, p. 41.

36. R. Warren Meddoff deposition, 8/19/97, p. 41.

37. R. Warren Meddoff deposition, 8/19/97, pp. 41, 135-136.

38. R. Warren Meddoff deposition, 8/19/97, p. 50.

39. Harold Ickes deposition, 6/27/97, pp. 40-42.

40. Harold Ickes deposition, 6/27/97, p. 40.

41. Exhibit 929: Fax from R. Warren Meddoff to Harold Ickes, 10/31/96; Harold Ickes deposition, 6/27/97, p. 46.

42. R. Warren Meddoff, 9/19/97 Hrg., p. 152.

43. Harold Ickes deposition, 6/27/97, pp. 57-58.
44. R. Warren Meddoff, 9/19/97 Hrg., pp. 16-17.
45. R. Warren Meddoff, 9/19/97 Hrg., pp. 16-17.
46. Harold Ickes deposition, 6/27/97, pp. 42-43.
47. Harold Ickes, 10/8/97 Hrg., pp. 132-33; see also pp. 142-43. Ickes also testified at the hearings on October 8, 1997 that Meddoff told him that he thought Ickes was being a scapegoat: "Mr. Meddoff, shortly before he testified, called my attorney, Mr. Bennett, and explained to him that he thought that Harold Ickes was being a scapegoat and he was getting a raw deal and on and on and on." Harold Ickes, 10/8/97 Hrg., p. 101.
48. Also supporting his contention, Ickes produced to the Committee a copy of the memorandum that he had in his files. Exhibit 929: Fax from R. Warren Meddoff to Harold Ickes, 10/31/96.
49. R. Warren Meddoff, 9/19/97 Hrg., pp. 25-27; R. Warren Meddoff deposition, 8/18/97, p. 6. The Associated Press obtained a copy of this deposition prior to Meddoff testifying at the hearing. See, e.g., Capital Times, 9/19/97.
50. Senator Torricelli, 9/19/97 Hrg., p. 75.
51. Exhibit 2066M: E-mail from R. Warren Meddoff to Christian Haar, 9/10/97.
52. Exhibit 2010M. The letter reads:

Dear Senator Dole:

This firm is currently representing an American entity in a transaction with and for the Republic of Bulgaria. Upon completion of this transaction we and our client are committing to the donation of \$5,000,000 to help the Republican Party during the 1996 Presidential election.

The transaction we are involved in deals with the exchange of Pre-1940 Gold Backed German Government External Loan Documents for the forgiveness of Sovereign debt and hard currency. Upon completion at its fullest extent this transaction could provide the Republic of Bulgaria with a credit against debt of \$700,000,000 and hard currency in excess of \$2,000,000,000. According to the stated policy of the U.S. Government this, would solidify market reforms and lead to enhanced U.S. security interests in the region.

You have been previously notified of individual government employees interfering in this transaction, contrary to policy. We thank you for the courtesy exhibited to the Bulgarian delegation during the President's visit of last week. We

appreciate your attention to this matter and keep your informed as to our progress.

Sincerely yours,

R. Warren Meddoff, P.A.

53. R. Warren Meddoff, 9/19/97 Hrg., pp. 35-36; R. Warren Meddoff deposition, 8/18/97, p. 144-146.

54. R. Warren Meddoff, 9/19/97 Hrg., pp. 35-36; R. Warren Meddoff deposition, 8/18/97, p. 144-146.

55. Senator Levin, 9/19/97 Hrg., p. 93.

56. R. Warren Meddoff, 9/19/97 Hrg., p. 35.

57. Exhibit 2005M. The letter reads:

Dear Mr. President:

This letter is to advise you that I am considering a large donation to the Democratic National Committee to assist you in the forth coming [sic] Presidential election this fall. Please have your staff contact my offices to coordinate presentation of this donation to you in person during my families [sic] Washington visit scheduled between April 3 and the 12th.

You have made great strides and accomplished under very difficult circumstances, particularly in the area of foreign affairs. I strongly support your efforts in spite of having been a life time supporter of the Republican Party. During my last visit to the White House, I had the pleasure and honor of observing your representation of our nation during the State visit of President Yeltsin.

I look forward to your response and wish you success in your future endeavors as President. Thank you for your kind consideration of this matter.

Sincerely yours,

R. Warren Meddoff

58. R. Warren Meddoff deposition, 8/19/97, pp. 16-17.

59. R. Warren Meddoff deposition, 8/19/97, p. 17.

60. R. Warren Meddoff deposition, 8/19/97, p. 17.

61. R. Warren Meddoff deposition, 8/19/97, p. 18.
62. R. Warren Meddoff, 9/19/97 Hrg., pp. 38-39.
63. R. Warren Meddoff, 9/19/97 Hrg., pp. 67, 87-93.
64. Dallas Observer, 1/1-7/98.
65. Dallas Observer, 1/1-7/98.
66. Dallas Observer, 1/1-7/98.
67. R. Warren Meddoff, 9/19/97 Hrg., pp. 80, 86.
68. R. Warren Meddoff, 9/19/97 Hrg., p. 23; see also R. Warren Meddoff deposition, 8/18/97, p. 81.
69. R. Warren Meddoff deposition, 8/19/97, p. 154.
70. R. Warren Meddoff, 9/19/97 Hrg., p. 24.
71. R. Warren Meddoff, 9/19/97 Hrg., p. 86; see Newsweek, 2/10/97.
72. R. Warren Meddoff deposition, 8/18/97, p. 56; R. Warren Meddoff, 9/19/97 Hrg., pp. 14-15, 99, 101.
73. Exhibit 931: fax from Don Fowler to Warren Meddoff, 10/31/96; Exhibit 2008M: fax from Don Fowler to Warren Meddoff, 10/31/96.
74. R. Warren Meddoff, 9/19/97 Hrg., pp. 15, 101.
75. R. Warren Meddoff, 9/19/97 Hrg., pp. 46-47; R. Warren Meddoff deposition, 8/18/97, p. 60.
76. R. Warren Meddoff, 9/19/97 Hrg., pp. 49-50. Exhibit 2007M: Richard Sullivan's 10/31/96 call sheet, which states:

Warren Metalf (sic) 12:20 p.m. Received letter. Did not spell his name right. Also, letter did not fulfill his requests.

Warren Meddoff. 3:30 p.m. Wants to know about revised letter he should be receiving.

Warren Meddoff 4:35 p.m. Tomorrow morning needs to speak with you right away. Still needs that letter.

The next day, November 1st, Meddoff called Mr. Sullivan yet again and left a message stating:

“Plz call re: people who has (sic) a request for POTUS.” Exhibit 2009M: Richard Sullivan call sheet with memorandum of call from Warren Meddoff, 11/1/96; R. Warren Meddoff, 9/19/97 Hrg., pp. 50-51.

77. R. Warren Meddoff, 9/19/97 Hrg., p. 51.

78. Exhibit 933: fax from Eric Berman/Dan Fee/Rick Hess to Harold Ickes/Jessica Fitzgerald regarding Meddoff, Morgan, Valduz and Bukkehave, 11/25/96.

79. R. Warren Meddoff, 9/19/97 Hrg., p. 102.

80. R. Warren Meddoff deposition, 8/18/97, p. 56.

81. Donald L. Fowler deposition, 5/21/97, pp. 332-33; see R. Warren Meddoff, 9/19/97 Hrg., p. 48. Meddoff did not have a specific recollection of telling Fowler not to be deterred if someone mentioned the CIA, but he said that he might have mentioned the CIA and suggested to Fowler that a reference might have raised his contact with the CIA, because he has had contact with that agency. R. Warren Meddoff, 9/19/97 Hrg., pp. 112-13.

82. Donald L. Fowler deposition, 5/21/97, p. 333; see R. Warren Meddoff, 9/19/97 Hrg., p. 48.

83. Donald L. Fowler deposition, 5/21/97, p. 335; see R. Warren Meddoff, 9/19/97 Hrg., p. 48.

84. R. Warren Meddoff deposition, 8/18/97, p. 70.

85. Exhibit 2065M: Letter from Majority Leader Trent Lott to R. Warren Meddoff thanking him for his \$2,500 contribution to the Republican Presidential Roundtable, 5/15/97.

86. R. Warren Meddoff, 9/19/97 Hrg., p. 44; R. Warren Meddoff deposition, 8/18/97, p. 133.

87. Col. Joseph J. Simmons IV deposition, 10/16/97, p. 134.

88. Col. Joseph J. Simmons IV deposition, 10/16/97, p. 134.

89. Col. Joseph J. Simmons, IV deposition, 10/16/97, pp. 134-135.